

Charles Talbert
7901 State Road
Phila. Pa. 19136

June 29, 2019

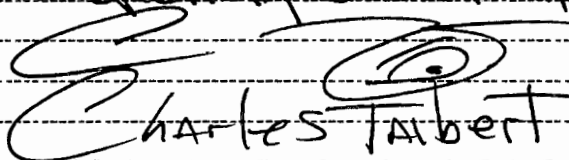
United States District Court
Eastern District of Pennsylvania

Charles Talbert, Civil Action No. 18-1620-MAK
vs. Plaintiffs Response In Opposition
Blanche Carney et al. To Defendants Motion To Strike

Plaintiff, hereby moves this Honorable Court
for an Order to deny Defendants' Motion To Strike
and in support thereof avers the following:

1. Plaintiff, has filed this action originally against Defendants Blanche Carney, Terance Clark, and Gerald May, for retaliation, and violating due process.
2. Since the filing of this action, correctional staff within the Philadelphia Department of Prisons, (specifically Williams Mulholland and Shaniqua Ford) has retaliated against Plaintiff for him doing so.
3. The Court herein accepted the filing of this amended complaint due to the demonstration of a continuous nexus of retaliation which can also show inseparable injury.
4. Plaintiff has been continuously oppressed and assaulted due to the filing of this lawsuit.
5. Plaintiff will be prejudiced if the Defendants motion to strike is granted because his non-frivolous claims will not have a chance to be litigated, and relief obtained.

WHEREFORE, Plaintiff respectfully requests for this response to prevail over Defendants' Motion to Strike.

Respectfully submitted,

Charles Talbert

CT

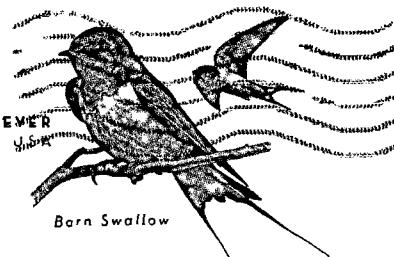
Philadelphia Department of Prisons

Philadelphia, PA 19136

PPN 810247

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U.S.M.S.
X-RAY

U.S. Clerk of Court
U.S. Courthouse
Independence Mall West
601 Market Street
Philadelphia, PA 19106-1797

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